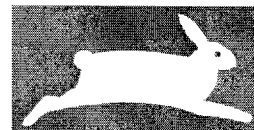


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PETA

PEOPLE FOR THE ETHICAL
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February 10, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Comments on the HPV test plan for 2-sec-butyl-4,6-dinitrophenol

Dear Administrator Leavitt:

The following comments relate to the test plan for 2-sec-butyl-4,6-dinitrophenol (4,6-dinitrobutylphenol; CAS no. 88-85-7), prepared by Crompton Corp. under the EPA's High Production Volume (HPV) Challenge Program. These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal-protection and environmental organizations have a combined membership of more than ten million Americans.

In the test plan and associated summaries, Crompton has presented a large volume of mostly published data from previous studies, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge. We commend Crompton on having conducted such a thorough search of the literature in this particular case.

With regard to the cell type to be used in the proposed *in vitro* chromosomal aberration test (OECD Test Guideline 473), the company does not specify the cells it intends to use. We urge Crompton to use human lymphocytes; however should the company choose to utilize Chinese hamster ovary (CHO) cells, it should ensure that any cells used are from an established cell line rather than from primary tissue.

Thank you for your attention to these comments. I can be reached at 757-622-7382, ext. 8001, or via e-mail at JessicaS@PETA.org.

Sincerely,

Jessica Sandler
Federal Agency Liaison

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